REMARKS

The new rejection of claims 11 – 16 over U.S. patent no. 5,887,145 ("Harari") under 35 U.S.C. §§ 102(b), 103(a) is respectfully traversed. The controller of the memory card is specified by claim 11 to manage operation of the memory, including causing data to be transferred "(b) between the memory and through the second set of contacts to the input-output card connected therewith without passing through the first set of contacts,". This and subsequent limitations of claim 11 together define a structure for transferring data directly between the memory within the memory card and something external to the input-output card, without having to go through the first set of contacts to which a host system is connected. That is, in addition to data being transferable between the host and memory through the controller, claim 11 recites that data are also transferable to and from the memory through the input-output card without passing through the contacts with the host. A "whereby" clause has been added to the end of claim 11 to provide such an operational summary of the recited structure.

Nothing has been found in the cited Harari reference that suggests such a direct data transfer. EPROM 52 of the mother card of Figure 4, taken by the Office Action (p. 3, ln. 2) to be the claimed memory, stores microcode for operating the processor of which it is a part (see Harari, col. 8, lns. 8 – 13). No portion of the Harari reference is pointed to by the Office Action to suggest direct transfer of data from outside the daughter card to the EPROM 52. The claim limitation of the controller causing data to be transferred "(b) between the memory and through the second set of contacts to the input-output card connected therewith without passing through the first set of contacts," is alleged to be met by the "right edge of mother card 40" of Figures 1, 3 and 4 (Office Action, p. 3, lns. 8 – 10). That is, the Office Action points only to the existence of the claimed second set of contacts as describing data transfer with the EPROM 52 (which would be the processor microcode described to be stored in EPROM 52) through an input-output card. It is respectfully suggested that this does not anticipate the direct transfer recitation of the claims. More than a mere connection of the daughter card with the mother card is recited in the claims. The claims additionally specify data transfer with the memory of the mother card through this connection without participation of the host system, as described in the preceding paragraph.
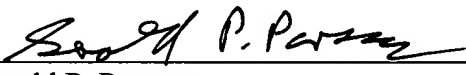
U.S. patent no. 5,831,533 ("Kanno") has been cited in combination with the Harari reference to form an obviousness rejection of claim 12. But since the Kanno reference also does

not suggest the claimed direct data transfer structure, claim 12, as well as the other dependent claims, are submitted to be allowable for the same reasons as claim 11.

In addition, the cited Harari reference does not describe the memory card to follow either a MMC or SD standard, as recited by claims 13 and 14, respectively.

Therefore, since the remaining claims 11 – 16 are still believed to be allowable, an early indication of the allowance of the present application is solicited. However, if the Examiner notes any further matters that need to be resolved, a telephone call to the undersigned attorney at 415-318-1163 would be appreciated.

Respectfully submitted,

Gerald P. Parsons
Reg. No. 24,486

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Date

PARSONS HSUE & DE RUNTZ LLP
655 Montgomery Street, Suite 1800
San Francisco, CA 94111
(415) 318-1160 (main)
(415) 318-1163 (direct)
(415) 693-0194 (fax)